

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

EUGENE WEBER & )  
JOY WEBER, )  
Plaintiffs )  
 )  
 ) Civil Action No.:  
v. )  
 )  
 )  
UBER TECHNOLOGIES, INC, )  
RASIER, LLC, )  
& JAMES JACKSON )  
Defendants )

---

COMPLAINT AND DEMAND FOR JURY TRIAL

---

**The Parties**

1. The plaintiff, Eugene Weber, is a New Jersey resident who resides at 20 Matrick Ct., Hillsborough, New Jersey.
2. The plaintiff, Joy Weber, is a New Jersey resident who resides at 20 Matrick Ct., Hillsborough, New Jersey.
3. The defendant, Uber Technologies, Inc., on information and belief, is a Delaware corporation with a principal place of business located at 1455 Market Street, 4th Floor, San Francisco, California.
4. The defendant, Rasier, LLC, is, on information and belief, a Delaware limited liability company doing business in the Commonwealth of Massachusetts on behalf of Uber, with a principal place of business located at 1455 Market Street, 4th Floor, San Francisco, California. At the time of the incident giving

rise to this complaint, on information and belief, the defendant, Rasier, LLC, was a subsidiary of Uber Technologies, Inc.

5. The defendant, James Jackson, is, on information and belief, a Massachusetts resident who resides at 32 Vesper Lane, Nantucket, Massachusetts.

**Jurisdiction**

6. Jurisdiction is based upon 28 U.S.C. § 1332. The amount in controversy exceeds \$75,000, not counting interest and costs of court, and the matter controversy is between citizens of different states. The plaintiffs reside in New Jersey, and the defendants reside or do business in Massachusetts.

**Venue**

7. Venue is proper pursuant to 28 U.S.C. § 1391(b)(1) and 28 U.S.C. § 1391(b)(2) in that this is the judicial district in which one defendant resides and in which a substantial part of the events occurred. Specifically, the personal injury incident giving rise to this action took place in Nantucket, Massachusetts. The injured plaintiff received initial treatment in Nantucket. Defendant Rasier, LLC, conducts everyday business throughout the state. Defendant Rasier, LLC, is registered with the Massachusetts Secretary of State as a foreign corporation with a registered agent in Boston, Massachusetts. Defendant Uber Technologies, Inc., conducts everyday business throughout the state. Defendant Uber Technologies, Inc. is

registered with the Massachusetts Secretary of State as a foreign corporation with a registered agent in Boston, Massachusetts. The driver of the vehicle involved in the incident, James Jackson, on information and belief, resides in Nantucket, Massachusetts.

### **The Facts**

8. On or about June 27, 2018, plaintiff, Eugene Weber, was entering into a vehicle which he had hired using the Uber application on his telephone. The Uber vehicle was operated by James Jackson. The location of the pick-up was on Bartlett Farm Road in Nantucket, Massachusetts.
9. On or about June 27, 2018, Mr. Jackson began driving away before Mr. Weber was fully in the vehicle.
10. At all relevant times to this complaint, James Jackson was a driver who was hired on the Uber mobile application.
11. The defendant, Rasier, LLC, on information and belief, is a wholly owned subsidiary of Uber Technologies, Inc.
12. The defendant, Rasier, LLC, on information and belief, is the company that contracts with the drivers who pick up passengers through the Uber app.
13. The defendant, Raiser, LLC, on information and belief, is the company that holds the Massachusetts Transportation Network Company (“TNC”) permit to operate in the commonwealth, which it does as Uber.

14. At all relevant times to this complaint, James Jackson was operating his Uber vehicle for the financial benefit of the defendants, Uber Technologies, Inc. and Rasier, LLC.
15. At all relevant times to this complaint, the defendant, James Jackson, was an agent, servant and/or employee of Rasier, LLC.
16. The cause of the incident described above was the carelessness and negligence of James Jackson in the operation of his Uber vehicle while serving as a servant, agent, or employee of Rasier, LLC.
17. At all relevant times to this complaint, the defendant, James Jackson, was an agent, servant and/or employee of Uber Technologies, Inc.
18. The cause of the incident described above was the carelessness and negligence of James Jackson in the operation of his Uber vehicle while serving as a servant, agent, or employee of Uber Technologies, Inc.
19. As a result of the incident described above, the plaintiff, Eugene Weber, was caused to sustain severe, permanent personal injuries, to suffer great pain of body and anguish of mind, and has expended large sums of money for medical care – currently totaling approximately \$77,000 – and will continue to expend large sums of money for medical care and attendance.
20. As a result of the injuries to Mr. Weber, plaintiff Joy Weber, suffered a loss of her husband's companionship, society, support and affection.

### **Causes of Action**

(Each Cause of Action Incorporates by Reference All Previous Allegations)

#### **First Cause of Action**

21. This is an action by the plaintiff, Eugene Weber, against the defendant, Uber Technologies, Inc., for damages caused by the negligence of the defendant's servant, agent, or employee, resulting in personal injuries and consequential damages.

#### **Second Cause of Action**

22. This is an action by the plaintiff, Joy Weber, against the defendant, Uber Technologies, Inc., for loss of consortium caused by the negligence of the defendant's servant, agent, or employee, resulting in personal injuries to her husband.

#### **Third Cause of Action**

23. This is an action by the plaintiff, Eugene Weber, against the defendant, Rasier, LLC, for damages caused by the negligence of the defendant's servant, agent, or employee, resulting in personal injuries and consequential damages.

#### **Fourth Cause of Action**

24. This is an action by the plaintiff, Joy Weber, against the defendant, Rasier, LLC, for loss of consortium caused by the negligence of the defendant's servant, agent, or employee, resulting in personal injuries to her husband.

**Fifth Cause of Action**

25. This is an action by the plaintiff, Eugene Weber, against the defendant, James Jackson, for damages caused by his negligence resulting in personal injuries and consequential damages.

**Sixth Cause of Action**

26. This is an action by the plaintiff, Joy Weber, against the defendant, James Jackson, for loss of consortium caused by his negligence resulting in personal injuries to her husband.

**Demands for Relief**

27. The plaintiff, Eugene Weber, demands judgment, in the amount of his damages, together with interest and costs as permitted by law, against the defendants, Uber Technologies, Inc., Rasier, LLC, and James Jackson, as to the First, Third, and Fifth Causes of Action.

28. The plaintiff, Joy Weber, demands judgment, in the amount of her damages, together with interest and costs as permitted by law, against the defendants, Uber Technologies, Inc., Rasier, LLC and James Jackson, as to the Second, Fourth, and Sixth Causes of Action.

**Jury Demand**

29. The plaintiffs claim a trial by jury as to all counts.

By Their Attorneys  
BREAKSTONE, WHITE & GLUCK, P.C.  
/s/David White

---

David W. White, Jr., Esq., BBO #543797  
Reza Breakstone, Esq., BBO #673067  
Two Center Plaza, Suite 530  
Boston, MA 02108-1906  
(617) 723-7676  
white@bwglaw.com  
rbreakstone@bwglaw.com

Dated: June 23, 2021